

# **EXHIBIT A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

v.

COLLINS MURPHY, LIMESTONE  
COLLEGE, MG FREESITES LTD d/b/a  
PORNHUB.COM, and HAMMY MEDIA,  
LTD. d/b/a XHAMSTER.COM,

Defendants.

Civil Action Number: 7:20-cv-00947-TMC

**APPLICATION/AFFIDAVIT  
PRO HAC VICE ADMISSION**

- (1) Name. Marc E. Mayer
- (2) Residence. I reside in California.
- (3) Business Address. I am an attorney and practice law under the name of or as a member of the following firm:

MITCHELL SILBERBERG & KNUPP LLP  
2049 Century Park East, 18th Floor  
Los Angeles, CA 90067  
T: 310.312.3154  
mem@msk.com

- (4) Jurisdiction of this Court. I, by execution of this Application and Affidavit, consent and agree to comply with the applicable statutes, laws, and rules of the State of South Carolina, with all applicable federal statutes, laws, and rules, including Local Rules of the United States District Court for the District of South Carolina (particularly, Local Civil Rule 83.I.08 and/or Local Criminal Rule 57.I.08). I consent to the jurisdiction of the United States District Court for the District of South Carolina in all matters of attorney conduct.<sup>1</sup>
- (5) Regular Practice of Law. I am a member in good standing of the bar of the highest court of the California where I regularly practice law. **Attached is my certificate of good standing.**

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<sup>1</sup>This District maintains a web site ([www.scd.uscourts.gov](http://www.scd.uscourts.gov)) from which the federal and local rules of procedure and related materials may be obtained.

- (6) Additional Bar Membership. I have been admitted to practice before the following courts: (List all of the courts Applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.) By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

| Court                                     | Date Admitted     | Good Standing                           |                             |
|---|-------------------|---|-----------------------------|
| <u>State Bar of California</u>            | <u>12/02/1997</u> | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| <u>USDC Central District CA</u>           | <u>12/02/1997</u> | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| <u>Supreme Court of California</u>        | <u>12/02/1997</u> | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| <u>USDC Eastern District CA</u>           | <u>02/09/2001</u> | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| <u>USDC Northern District CA</u>          | <u>02/09/2001</u> | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| <u>US Court of Appeals – 6th District</u> | <u>01/23/2003</u> | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| <u>US Court of Appeals – 9th Circuit</u>  | <u>05/20/2014</u> | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| <u>US Court of Appeals – 2nd Circuit</u>  | <u>08/06/2014</u> | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

- (7) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures? . . . . . ☐ Yes ☒ No

(If “yes,” give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided *in camera* but that fact shall be revealed below.)

- (8) Curtailement of Prior *Pro Hac Vice* Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked? . . . . . ☐ Yes ☒ No

(If “yes,” give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)

- (9) Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction? . . . . . ☐ Yes ☒ No

(If “yes,” give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)

(10) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?..... ☐Yes ☒No  
(If “yes,” give particulars, such as date, court, judge, circumstances, and ultimate disposition.)

(11) Present and Previous Pro Hac Vice in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina?..... ☐Yes ☒No

(If “yes,” give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.

(12) Designated Local Counsel. Local counsel of record associated with Applicant in this case is:

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| TURNER, PADGET, GRAHAM AND LANEY, P.A.<br>Post Office Box 1509<br>Greenville, South Carolina 29602<br>facsimile   864-282-5993 | R. Taylor Speer   Attorney ID: 12267<br>email   tspeer@turnerpadget.com<br>direct   864-552-4618<br><br>J. Kenneth Carter   Attorney ID: 05108<br>email   kcarter@turnerpadget.com<br>direct   864-552-4611 |
|--|---|

I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

(13) Associated Counsel. N/A

(14) Application Fee. I affirm that the application fee of three hundred and fifty dollars (\$350) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05 or paid herewith.

(15) Electronic Notification. By submitting this application, I consent to electronic notification.

(16) Represented Party/Parties. I seek to represent Defendant MG Freesites Ltd.

(17) I certify that I have read Local Civil Rule 30.04 regarding the conduct of depositions.

SWORN TO AND SUBSCRIBED BEFORE ME.

this 4th day of September 2020.

Anna M. Brock (L.S.)  
Notary Public for ~~California~~ South Carolina

My Commission Expires: 08/05/2024

MARC E. MAYER

  
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Marc E. Mayer

